

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALAN JOSEPH BAUER; DOUGLAS S. RABIN;
VIVIAN STEIR RABIN; RODDY TEEPLE;
ANDREW NEFF; NANCY NEFF; RICHARD
SANDERS POLIN; TAMMIE PUROW; MIMI
JANKOVITS; and DAVID GENET,

Plaintiffs,

v.

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE (HARVARD CORPORATION) and
THE HONORABLE AND REVEREND THE
BOARD OF OVERSEERS,

Defendants.

Civil Action No. 1:24-cv-10404-GAO

**DEFENDANTS' ASSENTED-TO MOTION TO EXTEND
DEADLINE TO RESPOND TO PLAINTIFFS' COMPLAINT**

Defendants¹ respectfully move this Court for an extension to May 13, 2024, to respond to Plaintiffs' Complaint in the above-captioned action. As grounds for this motion, Defendants state as follows:

1. The Complaint in this matter was filed on February 20, 2024.
2. Defendants were served with a copy of the Complaint on April 5, 2024. The deadline for them to respond is therefore April 26, 2024.
3. Undersigned counsel for the Defendants has conferred counsel for the Plaintiffs regarding additional time needed to respond to the claims asserted in the Complaint.

¹ Plaintiffs' Complaint incorrectly identifies the Harvard entities as "President and Fellows of Harvard College (Harvard Corporation) and The Honorable and Reverend the Board of Overseers." President and Fellows of Harvard College is the legal entity that comprises the various named defendants and is the only proper party to this litigation. All other named Harvard entities, including the Board of Overseers, should be dismissed from this proceeding.

4. Plaintiffs have assented to an extension of time through and including May 13, 2024, for Defendants to submit their response to the Complaint.

Accordingly, Defendants respectfully request that this Court issue an order extending Defendants' time to respond to the Complaint in this action to May 13, 2024.

Respectfully submitted,

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE and THE
HONORABLE AND REVEREND THE
BOARD OVERSEERS

By their attorneys,

/s/ Daniel J. Cloherty
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Dated: April 22, 2024

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(a)(2)

I hereby certify that I have conferred in good faith with counsel for the Plaintiffs regarding the issues presented in this motion. Counsel for the Plaintiffs has assented to the relief requested herein.

/s/ Daniel J. Cloherty
Daniel J. Cloherty

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the CM/ECF system, will be sent electronically to the registered participants, as identified on the Notice of Electronic Filing, and that paper copies will be sent to those indicated as non-registered participants on April 22, 2024.

/s/ Daniel J. Cloherty
Daniel J. Cloherty